

Robert P. Goe - State Bar No. 137019
Marc C. Forsythe – State Bar No. 153854
GOE & FORSYTHE, LLP
18101 Von Karman Avenue, Suite 1200
Irvine, CA 92612
rgoe@goeforlaw.com
mforsythe@goeforlaw.com

Telephone: (949) 798-2460
Facsimile: (949) 955-9437

Former Attorneys for the Official Committee of
Unsecured Creditors

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re:

MARC JOSEPH SPIZZIRRI,

Debtor.

Case No. 8:13-bk-14702-MW

Chapter 11 Proceeding

**STIPULATION TO CONTINUE
EXAMINATION RE: ENFORCEMENT OF
JUDGMENT**

Current Date: June 4, 2018
New Date: August 6, 2018
Time: 2:00 p.m.
Dept.: 6C
Judge: Hon. Mark S. Wallace

COMES NOW, Goe & Forsythe, LLP, Judgment Creditor (“G&F”), on the one hand, and
Debtor, Marc Joseph Spizzirri (“Spizzirri”) (together referred to herein as the “Parties”), on the
other hand, by and through their respective counsel, who respectfully request that the Court
approve the following stipulation of the Parties.

STIPULATION

The Parties hereby stipulate and agree, and respectfully request, that the EXAMINATION
RE: ENFORCEMENT OF JUDGMENT, currently scheduled to be held on June 4, 2018 in Dept.
6C of the above referenced Court, be continued to August 6, 2018, at 2:00 p.m.

Pursuant to the Parties' intentions to facilitate a resolution and reduce the Court's burden concerning the enforcement of the judgment, Spizzirri agrees to produce documents as requested by G&F and testify under oath concerning his assets and liabilities at G&F's office located at 18101 Von Karman, Suite 1200, Irvine, CA 92612 on July 2, 2018 at 2:00 p.m.

Upon satisfactory completion of the requirements of the preceding paragraph, as determined by G&F, G&F shall submit a request to the Court that the continued EXAMINATION RE: ENFORCEMENT OF JUDGMENT be vacated. The Parties further agree that if Spizzirri does not fully comply with the requirements of the preceding paragraph, the EXAMINATION RE: ENFORCEMENT OF JUDGMENT shall proceed on the continued date of August 6, 2018 at 2:00p.m. in Dept. 6C. Nothing in this stipulation is intended to prevent further periodic examinations as permitted by the Court and applicable law.

WHEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

That the EXAMINATION RE: ENFORCEMENT OF JUDGMENT, currently scheduled to be held on June 4, 2018 in Dept. 6C of the above referenced Court, be continued to August 6, 2018, at 2:00 p.m.

Dated: May 31, 2018

GOE & FORSYTHE, LLP

By: 
Robert P. Goe, Counsel for
Judgment Creditor, Goe & Forsythe, LLP

Dated: May 31, 2018

MARC JOSEPH SPIZZIRRI

By: 
Marc Joseph Spizzirri

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 18101 Von Karman Avenue, Suite 1200, Irvine, CA 92612

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO CONTINUE EXAMINATION RE: ENFORCEMENT OF JUDGMENT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) June 1, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) June 1, 2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) June 1, 2018, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

- The Honorable Mark Wallace, USBC, 411 West Fourth Street, Santa Ana, CA 92701

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 1, 2018 Susan C. Stein
Date Printed Name

/s/Susan C. Stein
Signature

Mailing Information for Case 8:13-bk-14702-MW

- **Mel Aranoff** maranoff@hrbc.com
- **Reem J Bello** rbello@wgllp.com, kadele@wgllp.com;vrosales@wgllp.com;cyoshonis@wgllp.com;cbmeeker@gmail.com
- **William M Burd** bill@ringstadlaw.com, jaimee@ringstadlaw.com
- **Dan E Chambers** dchambers@clfca.com
- **Ronald R Cohn** rcohn@horganrosen.com
- **Caroline Djang** caroline.djang@bbklaw.com, arthur.johnston@bbklaw.com;lisa.spencer@bbklaw.com
- **Fritz J Firman** firmanweber@Yahoo.com, centralservice.firmanweber@gmail.com
- **Marc C Forsythe** kmurphy@goeforlaw.com, mforsythe@goeforlaw.com;goeforecf@gmail.com
- **Nichole Glowin** nglowin@wrightlegal.net, BKUDGeneralupdates@wrightlegal.net
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- **Nancy S Goldenberg** nancy.goldenberg@usdoj.gov
- **Brian T Harvey** bharvey@buchalter.com, IFS_filing@buchalter.com;dbodkin@buchalter.com
- **James Andrew Hinds** jhinds@jhindslaw.com, mduran@jhindslaw.com
- **Stephen E Hyam** shyam@clarktreve.com
- **John Mark Jennings** johnmark.jennings@kutakrock.com
- **Edgar C Johnson** ej@vossjohnsonlaw.com, edgarcjohnson@gmail.com
- **Verlan Y Kwan** verlan@keystone-law.com
- **William N Lobel** wlobel@pszjlaw.com, nlockwood@pszjlaw.com;jokeefe@pszjlaw.com;banavim@pszjlaw.com
- **Brian R Nelson** becky@ringstadlaw.com, brian@ringstadlaw.com;arlene@ringstadlaw.com
- **Mike D Neue** mneue@dynamic-law.com, mwjaraki@me.com
- **Tom Roddy Normandin** tnormandin@pnbd.com, nwong@pnbd.com;srichards@pnbd.com;cathyjones@pnbd.com
- **Robert E Opera** ropera@wcghlaw.com, pj@wcghlaw.com;sly@wcghlaw.com
- **Eric S Pezold** epezold@swlaw.com, kcollins@swlaw.com
- **Brett Ramsaur** brett@ramsaurlaw.com, mwjaraki@me.com
- **Todd C. Ringstad** becky@ringstadlaw.com, arlene@ringstadlaw.com
- **Nanette D Sanders** becky@ringstadlaw.com, arlene@ringstadlaw.com
- **Justin Santarosa** jasantarosa@duanemorris.com
- **Paul R Shankman** pshankman@jhindslaw.com, mduran@jhindslaw.com
- **Bradley D. Sharp (TR)** bsharp@dsi.biz
- **Leonard M Shulman** lshulman@shbllp.com
- **Scott O Smith** ssmith@buchalter.com, dcyrankowski@buchalter.com;docket@buchalter.com
- **Derrick Talerico** dtalerico@ztlegal.com, maraki@ztlegal.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov
- **Michael J. Weiland** mweiland@wgllp.com, kadele@lwgfllp.com;vrosales@lwgfllp.com;cbmeeker@gmail.com
- **Jeffrey N Williams** jwilliams@wargofrench.com
- **Brian Barour Yeretian** byeretian@jhindslaw.com, yeretian@gmail.com